



**CONESTOGA-ROVERS
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September 10, 2010

Reference No. 006029-10

Mr. Regan S. Williams
State Project Coordinator
Ohio EPA - Division of Emergency & Remedial Response
2110 East Aurora Road
Twinsburg, Ohio 44087

Dear Mr. Williams:

Re: Annual Progress Report No. 15
Operation, Maintenance, and Monitoring
Summit National Superfund Site, Deerfield Township of Portage County, Ohio

In accordance with Paragraph XI.A of the Consent Decree for the Summit National Superfund Site (Site) in Deerfield Township of Portage County, Ohio, the Summit National Facility Trust (SNFT) hereby submits two copies of the Annual Progress Report No. 15 for the operation, maintenance, and monitoring activities at the Site for the period of September 1, 2009 to August 31, 2010.

Should you have any questions, please do not hesitate to contact the undersigned.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Steve Whillier

SAW/rrw/Will-065
Encl.

US EPA RECORDS CENTER REGION 5



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cc: **Pablo Valentin, USEPA RPM (2 copies)**
James Morris, USEPA Regional Counsel
Assistant Attorney General, Land and Natural Resources Division,
US Department of Justice
Supervisor, Office of Corrective Action, Director, State, Ohio EPA
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ANNUAL PROGRESS REPORT NO. 15

OPERATION, MAINTENANCE, AND MONITORING PERIOD SUMMIT NATIONAL SUPERFUND SITE DEERFIELD, OHIO

PERIOD: SEPTEMBER 1, 2009 TO AUGUST 31, 2010

This annual progress report is submitted to the United States Environmental Protection Agency (USEPA) and the Ohio Environmental Protection Agency (OEPA) by the Summit National Facility Trust Fund (SNFT), as required by Paragraph XIA of the Consent Decree for the Summit National Superfund Site (Site) in Deerfield, Ohio.

A. GROUNDWATER EXTRACTION AND TREATMENT SYSTEM

1. The groundwater extraction and treatment system at the Site was shut down for the reporting period as approved by OEPA.
2. No sampling was conducted on the treatment plant influent or effluent as the groundwater extraction and treatment system was shut down for the reporting period.
3. Sampling of the vapor phase carbon adsorber discharge was not completed during the reporting period as the groundwater extraction and treatment system was not operational.
4. No sludge was removed during the reporting period as the groundwater extraction and treatment system was not operational.

B. GROUNDWATER MONITORING

1. Submitted the April 2009 Groundwater Monitoring Report to OEPA and USEPA on September 2, 2009.
2. Received OEPA January 6, 2010 comments on the April 2009 Groundwater Monitoring Report and submitted responses to OEPA comments to OEPA and USEPA on March 26, 2010.
3. Completed the 2010 annual groundwater hydraulic monitoring event on June 2, 2010. Commenced preparation of the June 2010 groundwater monitoring report, which will be submitted to OEPA and USEPA in September 2010.
4. Completed the 2010 annual groundwater sampling on June 2, 2010. Commenced preparation of the June 2010 groundwater monitoring report, which will be submitted to OEPA and USEPA in September 2010.

C. GENERAL SITE MAINTENANCE

1. SNFT provided general Site maintenance activities as required by the Operation, Maintenance, and Monitoring Plan (OMMP) for the Site for this reporting period, including weekly Site inspections.
2. The major maintenance activities associated with the groundwater extraction and treatment system at the Site consisted of routine site maintenance and included the following activities:
 - a. Performed maintenance on treatment building, including inspection and maintenance of the building electrical system and annual fire extinguisher inspection
 - b. Pumped out septic tank and emptied trash dumpster
 - c. Repaired and reset front access gate to allow easier operation
 - d. Cut grass as needed
 - e. Plowed snow on Site entrance as needed

D. GROUNDWATER MIGRATION EVALUATION

1. In the April 2009 groundwater monitoring report, SNFT recommended that the groundwater migration evaluation be extended to 2013 with annual groundwater monitoring and reporting. OEPA approved the continued shutdown of the groundwater extraction system with annual groundwater monitoring in a letter dated April 28, 2010.

E. MISCELLANEOUS

1. Prepared and submitted the September 1, 2008 through August 31, 2009 Annual Progress Report No. 14 to OEPA and USEPA on September 10, 2009.
2. The annual sediment sample was obtained at the confluence of the south and east drainage ditches adjacent to the Site on June 2, 2010. The analytical results will be reported to OEPA and USEPA with the June 2010 Groundwater Monitoring Report in September 2010.
3. The USEPA August 2008 5-Year Site Review Report noted that USEPA would request the Potentially Responsible Parties (PRPs) to conduct specific activities related to an Institutional Controls (ICs) study for the Site, including performing title work and proposing an environmental covenant (EC) under Ohio's UECA to be recorded to ensure long-term unencumbered access to the Site and a secure ownership to maintain the remedy. At USEPA's request, the PRPs secured title work which showed that John Vasi remains the title holder of the Summit National Facility Site, as defined in the Consent Decree. After determining that imposing an EC on the Site was not practical without Mr. Vasi's cooperation, and determining that such cooperation was not available, with USEPA's concurrence, in August 2010 the PRPs recorded an Affidavit on Facts Relating to Title. That recorded document will put any potential buyer on notice of the Consent Decree

and the associated land use restrictions, including the existence of the broad site access given to the USEPA, OEPA, and the Settling Defendants under the Consent Decree, and the limitations on Mr. Vasi's ability to transfer the property without extensive restrictions. The recording of the Affidavit sufficiently addresses any concern of the Agency as set forth in the 5-Year Review Report relating to ICS' for the Site.

F. ACTIVITIES SCHEDULED FOR NEXT REPORTING PERIOD

1. Continue general Site inspections, maintenance and monitoring.
2. Finalize and submit the June 2010 Groundwater Monitoring Report to OEPA and USEPA in September 2010.
3. Conduct the 2011 annual sediment and surface water sampling at the confluence of the south and east drainage ditches, and submit the analytical results to OEPA and USEPA.
4. Conduct the 2011 annual groundwater hydraulic monitoring and submit the results to OEPA and USEPA.
5. Conduct the 2011 annual groundwater quality monitoring (with analysis for Site-Specific Indicator Parameter List [SSIPL] compounds) and submit the analytical results to OEPA and USEPA.